

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

JUSTINA CHAPPELL,
AS ADMINISTER OF THE ESTATE
OF DELYLE WALTER CHAPPELL,

Plaintiff,

v.

PRECISION DRILLING
CORPORATION, PRECISION
DRILLING COMPANY, LP,
CABOT OIL & GAS CORPORATION,
COTERRA ENERGY, INC.,
FORUM ENERGY
TECHNOLOGIES, INC., AND FORUM
ENERGY SERVICES, INC.

Defendants.

C.A. No. 3:23-cv-00604-RDM

**NOTICE OF INTENTION TO TAKE ORAL AND
VIDEOTAPED DEPOSITION OF CORPORATE REPRESENTATIVE OF
DEFENDANT FRANK’S INTERNATIONAL, LLC (N/K/A EXPRO AMERICAS LLC)**

PLEASE TAKE NOTICE that counsel for Precision Drilling Company, L.P. will take the oral and videotaped deposition of the corporate representative of Non-Party Frank’s International, LLC (n/k/a Expro Americas LLC) (“Frank’s”) on **May 9, 2025**, beginning at **9:30 a.m. CST** at the offices of Blank Rome, 717 Texas Avenue, Suite 1400, Houston, Texas. The deposition will continue from day to day until completed.

The corporate representative examination will concern the matters set forth in Exhibit “A” attached hereto. Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Frank’s must designate one or more officers, directors, or managing agents, or other persons who consent to

testify on its behalf, with a reasonable time before the deposition. Frank's may set out the matters on which each person designated will testify, but each person must testify as to matters that are known or reasonably available to them. The deposition may be used at the time of trial and for all other discovery purposes.

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

By: /s/ Jeffrey S. Davis
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**ATTORNEYS FOR DEFENDANT,
PRECISION DRILLING COMPANY,
LP AND PRECISION DRILLING
CORPORATION**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was delivered to all known counsel of record or parties via e-service on the 16th day of April, 2025:

/s/ Jeffrey S. Davis
Jeffrey S. Davis

Exhibit A

DEFINITIONS

As used herein, the words and phrases set out below have the following meaning or meanings:

1. “You,” “Your,” and/or “Frank’s” shall refer to Frank’s International LLC., including but not limited to its subsidiaries, affiliates, agents, employees, or other persons or entities who are acting on behalf of Frank’s.

2. “Mr. Chappell” shall refer to the decedent in this lawsuit, Delyle Walter Chappell that occurred on April .

3. “Event” or “Accident” shall mean the incident made the basis of Plaintiff’s suit that occurred on April 13, 2021.

4. “Pipe Wrangler” refers to the pipe wrangler allegedly in operation near Delyle Walter Chappell at the time the Accident occurred, as alleged in Plaintiff’s Complaint.

5. “Lawsuit” as used herein means the above-referenced lawsuit.

6. The phrase “relate to,” “related to,” and “relating to,” or any variant thereof, include but not are not limited to, the following meanings: referring to, supporting, located in, considered in connection with, bearing, bearing on, evidencing, indicating, reporting on, recording, alluding to, responding to, concerning, opposing, favoring, connected with, commenting on, in respect of, about, regarding, discussing, showing, describing, reflecting, analyzing, constituting and being.

7. “And” and the term “or” shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive.

TOPICS

Topic 1: Frank's policies and procedures applicable to the work being performed by Mr. Chappell at the time of the Accident.

Topic 2: The training that Mr. Chappell received relating his work being performed at the time of the Accident.

Topic 3: Frank's investigation into the Accident, including the findings and conclusions set forth in the Fatality Investigation Summary generated by Frank's (FI-GEN=F-M030 REV 03).

Topic 4: The documents produced by Frank's in response to the document request.